

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

**SAINT THOMAS ENTITIES' MOTION FOR LEAVE
TO FILE EXHIBIT UNDER SEAL**

The Saint Thomas Entities¹ move this Honorable Court, pursuant to Local Rule 7.2, to permit Exhibit A of the Saint Thomas Entities' Response to United States' Motion to Intervene to Oppose Saint Thomas Entities' Motion to Compel Medical Sales Management Inc. to Produce Certain Materials Produced in Criminal Discovery to be filed under seal. Exhibit A consists of a 5-minute excerpt of highlights from an MSM training video. The training video from which the excerpts were pulled is designated as Confidential Discovery Material by MSM pursuant to this Court's Third Amended Protective Order (Dkt. No. 814). It should remain under seal until this MDL is terminated and should then be returned to local counsel for the Saint Thomas Entities.

WHEREFORE, the Saint Thomas Entities respectfully request that the Court permit the exhibit referenced above to be filed under seal.

1 Saint Thomas West Hospital f/k/a St. Thomas Hospital; Saint Thomas Health; and Saint Thomas Network.

Dated: October 7, 2015

SAINT THOMAS WEST HOSPITAL F/K/A
ST. THOMAS HOSPITAL, SAINT THOMAS
HEALTH, AND SAINT THOMAS
NETWORK

By their attorneys,

/s/ Sarah P. Kelly

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*Appearing Pro Hac Vice

CERTIFICATE OF SERVICE

I certify that this document filed through the CM/ECF system will be served electronically to the registered participants identified on the Notice of Electronic Filing this 7th day of October, 2015.

/s/ Sarah Kelly
Sarah P. Kelly

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